



United States
Environmental Protection
Agency

Office of Public Affairs
Region 5
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Illinois Indiana
Michigan Minnesota
Ohio Wisconsin

Envirosafe Services of Ohio, Inc. Permit Modification Fact Sheet

Oregon, Ohio

April 1998

This Fact Sheet Explains

- The Resource Conservation and Recovery Act (RCRA)
- The background of the Envirosafe Services of Ohio, Inc. (ESOI) facility
- How the public can participate in the permit modification process
- How to obtain additional information

Public Comment Period

To encourage public involvement in modifying the RCRA permit for the ESOI facility, the U.S. Environmental Protection Agency (U.S. EPA) will hold a 45-day public comment period from **April 17 to June 1, 1998** in order to obtain public comments on the proposed permit modifications. Written comments can be sent to U.S. EPA at the address shown on the last page of this fact sheet. The comment sheet included in this fact sheet is provided for comment submittal. All comments must be postmarked no later than **June 1, 1998**.

Public Meeting

U.S. EPA will hold a public meeting to discuss the ESOI facility's proposed RCRA permit modifications. At the meeting, U.S. EPA will present information regarding the proposed permit modifications and will record official public comments. Meeting information is provided below.

Date: May 6, 1998
Time: 6:00 to 9:00 p.m.
Place: City of Oregon
Municipal Complex
5330 Seaman Road
Oregon, Ohio

Introduction

The U.S. Environmental Protection Agency (U.S. EPA) will be modifying the Resource Conservation and Recovery Act (RCRA) permit for the Envirosafe Services of Ohio, Inc. (**ESOI**) facility in Oregon, Ohio, to (1) include clarification of ESOI's corrective action requirements to conduct a facility-wide environmental investigation, (2) update permit language, and (3) add additional permit conditions for operating the permitted containment **building**. (Words that appear in **bold** type are defined in the glossary below.) U.S. EPA requires the facility-wide investigation to determine the nature and extent of environmental contamination at the facility, if any, and to evaluate measures for addressing any such contamination. Before the permit can be revised, Federal regulations mandate that the public be given the opportunity to participate in the decision-making process by submitting comments on the proposed modifications to **U.S. EPA**. The public can learn more about the ESOI facility and the proposed permit modifications by reviewing documents available at the information repositories established for the ESOI facility. The addresses for the information repositories are shown under "Additional Information" on the last page of this fact sheet. The proposed permit changes are outlined in this fact sheet and are presented in full in a document entitled "Draft Hazardous Waste Management Permit," which is available at the information repositories. The facility background, proposed permit modification, permit modification process participation, and additional information regarding the site are discussed below.

Glossary

Areas of concern (AOC): Any area where a release or possible release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis

Containment building: A completely enclosed structure used to store or treat hazardous waste

Corrective measures study (CMS): A study conducted to identify and evaluate potential remedial alternatives for a RCRA-regulated facility at which it has been determined that corrective measures are required to address hazardous substance releases

Landfill: A permanent disposal facility where waste is placed in **or** on the land

RCRA facility investigation (RFI): An investigation conducted at a RCRA-regulated facility after a hazardous substance release has been identified and additional information is necessary to determine the nature and scope of corrective action; the purpose of an RFI is to characterize the nature and extent of contamination

Solid waste management unit (SWMU): Any discernible unit at which solid wastes have been placed at any time; such units include any areas where solid wastes have been routinely and systematically released

THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

In 1976, the U.S. Congress passed RCRA to regulate the generation, treatment, storage, and disposal of municipal and industrial wastes at facilities across the country. RCRA was established to achieve the following goals: (1) protect human health and the environment, (2) reduce waste generation and conserve energy and natural resources, and (3) reduce or eliminate the generation of hazardous wastes.

RCRA requires that a facility obtain an operating permit from either U.S. EPA or an authorized state government agency to treat, store, or dispose of any hazardous waste. The facility is then required to manage hazardous wastes in accordance with permit conditions. RCRA also establishes procedures for a facility to make permit modifications, if necessary. All significant changes to a facility's permit must be reviewed and approved by U.S. EPA or the state agency before they can be incorporated into the facility's permit and implemented. RCRA also requires facility owners and operators to clean up contamination caused by present and past activities at the facilities. These cleanup activities are **known** as "corrective actions."

Public involvement is a very important part of the RCRA process and ensures that the public understands any proposed plans for handling hazardous wastes in the community and **has** the opportunity to voice concerns regarding the plans. Final decisions regarding permits, permit modifications, and corrective actions are not made until the public is given the opportunity to review and comment on these issues.

The ESOI facility is located at 876 Otter Creek Road in Oregon, Ohio (see facility location map on the insert), and occupies about **134** acres. Since 1954, the facility has operated as a solid waste **landfill**. In the 1970s, ESOI received municipal, commercial, and industrial wastes. In November 1988, ESOI received its RCRA operating permit, making it the only commercial hazardous waste landfill facility in Ohio to receive such a permit from both U.S. EPA and the Ohio Environmental Protection Agency (OEPA). Hazardous waste activities currently conducted by the facility include waste transportation, landfilling, treatment in **tanks** and a **containment** building, and storage in containers. ESOI currently receives hazardous wastes from several types of industries, including the chemical, steel, petroleum, and pharmaceutical industries. The ESOI facility itself also generates hazardous wastes during on-site treatment, storage, and disposal activities.

From 1995 through 1997, **ESOI** conducted a focused **RCRA facility investigation (RFI)** to gather information about the facility regarding past and potential releases of hazardous substances in the northern portion of the facility and **to** determine whether additional investigation and potential cleanup actions were necessary at the Northern Sanitary Landfill. After reviewing ESOI's RFI report and monthly progress reports, **U.S. EPA** determined that additional information was needed to adequately assess facility conditions. **To** gather this information, U.S. EPA reviewed aerial photographs of the facility property taken over a period of **57** years. **U.S. EPA** also reviewed analytical **data** from samples of environmental media (soil and groundwater) collected from the facility. Based on the information gathered, **U.S. EPA** determined that hazardous substances may have been released into the environment from the facility. As a result, U.S. EPA is requiring ESOI to conduct a more thorough facility-wide RFI, which includes all areas of past disposal activities and other **areas of concern (AOC)**.

Based on the results of the RFI and analyses of other **data**, U.S. EPA believes additional chemicals should be included in ESOI's groundwater monitoring program. Therefore, as part of the RCRA permit modification, additional chemicals **are** proposed to the groundwater monitoring list. These chemicals were detected in soil and groundwater at the facility during the RFI or other groundwater monitoring events.

Proposed Permit Modifications

The proposed modifications to ESOI's Federal RCRA permit include several changes to the existing permit. These changes are listed in the box below. The changes are presented in full in the "Draft Hazardous Waste Management Permit" available for public review at the information repositories located at the addresses listed under "Additional Information" on the last page of this fact sheet.

The main purpose of the proposed permit modifications is to determine if any environmental contamination exists as a result of past activities at the ESOI facility and, if so, to determine the best method for cleaning up the contamination. The proposed modifications will require ESOI to conduct a facility-wide RFI to thoroughly evaluate the nature and extent of contamination, if any, in facility groundwater, surface water, soil, waste, and air. The RFI will study portions of the facility that are referred to as solid **waste management units (SWMU)** and **AOCs**. SWMUs and AOCs are indicated on the facility arrangement map on the insert. Before conducting the RFI, ESOI will prepare a work plan to outline activities to be conducted under the RFI. The work plan will be reviewed and approved by U.S. EPA before RFI work begins. Upon completion of RFI activities, ESOI will be required to submit an RFI report discussing the investigation findings. This report will also be subject to U.S. EPA review and approval.

If the results of the RFI show that no hazardous substances were released into the environment or that releases at the facility do not pose any threat to human health or the environment, ESOI will not be required to conduct any additional activities for the investigated **portions** of the facility. However, if RFI results show that hazardous substances were released to the environment and that these releases pose unacceptable risks to human health or the environment, ESOI will be required to conduct activities called "corrective measures" to address these problems. ESOI will **then** conduct a study called a **corrective measures study (CMS)** to develop and evaluate a number of alternatives for correcting facility conditions. Before conducting the CMS, ESOI will first prepare a CMS work plan outlining activities planned for the CMS. After U.S. EPA reviews and approves the work plan, ESOI will conduct the CMS and prepare a CMS report, also subject to U.S. EPA review and approval. Based on information provided in the CMS report, U.S. EPA will select the best alternative for correcting conditions at the facility. U.S. EPA's selection will be based on a standard set of criteria used to assess corrective measures alternatives at all RCRA-regulated facilities. If corrective measures are selected, ESOI's RCRA permit will be modified again to include implementing the corrective measures.

PROPOSED PERMIT MODIFICATIONS

The following changes are being proposed to ESOI's permit:

- Clarification of specific corrective action requirements, including conducting a facility-wide RFI
- Addition of dispute resolution provisions
- Modification of the list of constituents that must be analyzed during routine groundwater monitoring
- Additional permit conditions for the operation of the containment building and its containment systems
- Update of some permit language and correction of typographical errors
- Modification of the list of constituents that must be analyzed in the liquid samples collected in the landfill leak detection system

[REDACTED]

U.S.EPA wants public comments **on** the proposed permit modifications for the ESOI facility. A 45-day public comment period will be held **from** April 17 to **June 1, 1998** to encourage the public to participate in the permit modification process. During the comment period, **U.S.EPA** will accept written comments on the proposed modifications. All comments must be postmarked no later than June 1, 1998. **U.S.EPA** will also hold a public meeting on May 6, 1998 to discuss the proposed modification; Public comments will be recorded at the meeting.

At the close of the comment period, **U.S.EPA** will consider and respond to all significant comments. **U.S.EPA** will issue the final permit modification only **after** considering all substantive comments. Copies of the summarized comments and **U.S.EPA's** responses will be provided to all interested parties that submit comments on the proposed permit modification. The summarized comments and **U.S.EPA's** responses will also be included in the information repositories for public review.

[REDACTED]

If you would like additional information on the ESOI facility and the proposed permit modifications, please visit one of the information repositories at the following locations:

Oregon Public Library
3340 Dustin Street
Oregon, Ohio 43616

U.S. Environmental Protection Agency Region 5
Waste, Pesticides and Toxics Division
RCRA Records Center (7th Floor)
77 West Jackson Boulevard
Chicago, Illinois 60604

If you have any questions about **this** proposed modification or other activities at the ESOI facility, please contact:

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ADDRESS CORRECTION REQUESTED

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